

UNITED STATES DISTRICT COURT
Western District of Massachusetts

KEITH BRIAN ASKINS
Plaintiff

V.

WILLIAM C. WERNICKI TRUCKING
Defendant

Civil Action No.: 04-30178-KPN

February 23, 2006

DEFENDANT WILLIAM C. WERNICKI TRUCKING'S
PROPOSED VOIR DIRE QUESTIONS AND PROPOSED VERDICT FORM

VOIR DIRE QUESTIONS:

The defendant proposes the following voir dire questions and/or areas of inquiry.

1. Have you ever been called to or had prior jury duty, state or federal court, civil or criminal?
2. If yes, was it civil or criminal and did you render a verdict.?
3. Have you ever sued anyone or been sued by anyone?
4. Did you or any members of your family ever work for the United States Postal Service?

5. Have you or any members of your family been involved in law enforcement worked for lawyers, claims investigation or accident investigation?

6. Have you ever suffered any injuries which required medical attention as a result of an accident?

7. Have you or any members of your family, including children, close friends, or business associates ever been involved in an accident in which you sustained personal injuries and brought a claim seeking money damages for those injuries?

8. Have you or anyone close to you ever been involved in a serious fall down accident resulting in injuries or a trip to the emergency room?

9. If so, how did the accident occur and whether a claim was brought as a result of the accident?

10. Have you ever injured your knee in any way shape or form requiring medical attention?

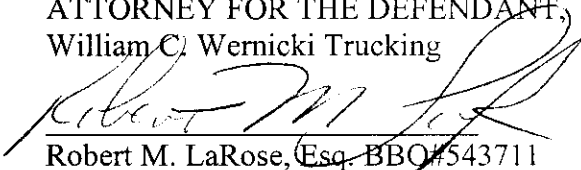
11. If so, please explain the nature of the injury and the nature of treatment and whether or not you suffer from any symptoms currently as a result of the knee injury?

12. Have you or any members of your immediate family worked on a loading dock or warehouse in which the job responsibilities included unloading tractor trailer trucks?

VERDICT FORM:

The defendant attaches herewith a proposed verdict form.

ATTORNEY FOR THE DEFENDANT,
William C. Wernicki Trucking

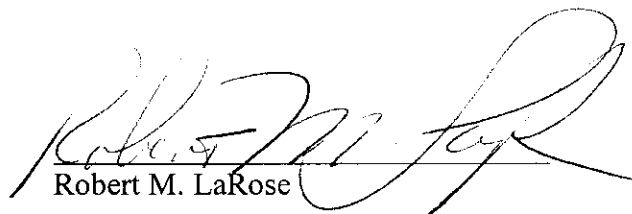


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CERTIFICATE OF SERVICE

I, Robert M. LaRose, Esq., do hereby certify that a copy of this Proposed Voir Dire Questions and Proposed Verdict Form has been sent to the following counsel of record via first class mail on February 23, 2006, as follows:

Walter Stewart, Esq
Barry E. O'Connor, Esq.
293 Bridge Street, Suite 326
Springfield, MA 01103



Robert M. LaRose